

201-15592



Elizabeth\_Moran@americanchemistry.com

09/10/2004 08:41 PM

To: Karen Hoffman/DC/USEPA/US@EPA

cc:

Subject: Re: One more question re: July 27th letter from Olefins Panel

Karen:

The Olefins Panel submitted a letter to then EPA Administrator Christine Todd Whitman on December 14, 2001 clarifying the CAS numbers being sponsored by the Panel under the HPV program. A copy of that letter is attached. This letter indicates that the Panel is covering 73 CAS numbers and they are listed in table 2. When I compared Table 2 to the EPA Website list of CAS number being sponsored by the Panel I found two differences. First, CAS number 106-99-0 (1,3-butadiene). While the Panel used data from this CAS number to characterize the toxicity of some mixed streams, the Panel is not sponsoring this CAS number. This CAS number is in the OECD SIDS program and thus did not require a sponsor in the HPV Program. Second, CAS number 68477-53-2 is not listed as being sponsored by the Olefins Panel and should be as it is in Table 2 of our December 14, 2001 letter.

If you make those two corrections to the Website, the number of CAS numbers sponsored by the Panel is 73 then add the 5 from our July 27, 2004 letter and you get 78.

Please clarify that 106-99-0 is removed from the Website as sponsored by the Olefins Panel and that 68477-53-2 is added.

I hope that explains the issue. Please let me know if you have additional questions.

Bette

(See attached file: Clarification Letter121001 PDF.pdf)

Elizabeth J. Moran, Ph.D.  
Senior Director  
American Chemistry Council  
1300 Wilson Blvd  
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Hoffman.Karen@epa  
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To:

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RECEIVED

Elizabeth\_Moran@americanchemistry.com

09/08/2004 03:27 PM

re: July 27th

cc:

Subject: One more question

letter from Olefins Panel

Dr. Moran:

In addition, we noted that your letter states that the addition of these CAS numbers brings the total number of commitments for the ACC Olefins Panel to 78. According to the our Sponsorship database, the ACC Olefins Panel will have 79 commitments after the addition of the 5 subject CAS.

Could you please clarify this number for us?

Thanks!

Sincerely,

Karen Hoffman, MPH  
Program Analyst  
Existing Chemicals Branch  
U.S. Environmental Protection Agency  
EPA East - Room 4410-E, Mail Code - 7405M  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460  
Phone (202) 564-8158, FAX (202) 564-4775

----- Forwarded by Karen Hoffman/DC/USEPA/US on 09/08/2004 03:19 PM

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Karen Hoffman

Elizabeth\_Moran@americanchemistry.com

09/08/2004 03:14

PM

information re: July 27th letter from

To:

cc:

Subject: Need some

Olefins Panel

Dr. Moran:

We received your letter from the Olefins Panel dated July 27, 2004. In it, you indicated that the Olefins Panel will sponsor 5 Cas numbers:

CAS 64742478  
CAS 68602799  
CAS 68606246  
CAS 68512787  
CAS 68553140

As you may know, the HPV Challenge Program has required that each chemical be "covered" or sponsored specifically by a consortium member company on behalf of the consortium. So far, we have not received communication from any of the Olefins Panel members.

As a result, until we receive either an email (sent to me) or a letter addressed to our Merrifield Post Office, the first three CAS numbers above will be placed in the Provisional Fully sponsored category and the last two chemicals will be placed in the Provisional Viable category.

Please contact me if you have any questions. My phone number is: 202-564-8158. Otherwise, we will look forward to receiving letters from the Olefins Panel members "covering" each of the five chemicals.

Sincerely,

Karen Hoffman, MPH  
Program Analyst  
Existing Chemicals Branch  
U.S. Environmental Protection Agency  
EPA East - Room 4410-E, Mail Code - 7405M  
1200 Pennsylvania Avenue NW  
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Phone (202) 564-8158, FAX (202) 564-4775



Clarification Letter121001 PDF.pdf

December 14, 2001

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06 SEP 19 07:12:42

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
P. O. Box 1473  
Merrifield, VA 22116

RE: Clarification of CAS Numbers Volunteered by the Olefins Panel in the HPV  
Chemical Challenge Program

Dear Ms. Whitman:

This letter is submitted on behalf of the American Chemistry Council Olefins Panel (Panel) to correct certain inaccuracies on the EPA Website pertaining to the CAS numbers sponsored by the Panel under EPA's High Production Volume (HPV) Challenge Program. The inaccuracies are found in two lists of volunteered CAS numbers on the EPA Website (the October 12, 2001 HPV Challenge Summary Report with data through July 13, 2001 and the September 6, 2001 1990 HPV list). This letter provides some background explanation, and then identifies the specific corrections that are needed.

### **Background**

The Panel submitted its initial letter volunteering to sponsor certain CAS numbers in the HPV Chemical Challenge Program on October 18, 1999. The Panel submitted a letter volunteering for additional CAS numbers on November 23, 1999. On April 12, 2000, the Panel submitted a letter clarifying the previous two letters. Copies of the three letters are attached.

Most of the Panel's CAS numbers are Class 2 substances, covering process streams, or mixtures. As you know, CAS numbers for Class 2 substances are not unique for a particular composition or even for a unique chemical process. Thus, a Class 2 CAS number can be used correctly to describe several different process streams, and several different CAS numbers can correctly describe a single process stream. Other consortia may use the same CAS numbers to describe similar or dissimilar compositions.

To avoid duplicate testing of products, the Olefins Panel has coordinated with other consortia, such as the API Petroleum HPV Testing Group (PHTG) and the International Hydrocarbons Solvents Consortium (IHSC), to identify CAS numbers of common interest. Where the Panel and another consortium used a CAS number to describe a similar product, a decision was made as to which consortium would include the CAS number in its test plans. Where more than one consortium used a CAS number to describe different products, both consortia might include the CAS number in their test plans. In the case of some CAS numbers, the Panel is relying on data developed by another consortium, and this is noted in Panel Test Plans. For other CAS numbers, another consortium is relying on data being developed by the Panel.

As indicated in the preceding paragraph, in the case where the Panel and another testing consortium decided to sponsor the same CAS number with similar compositions, a "division of labor" arrangement was made, whereby the Panel would take responsibility for including certain CAS numbers in its test plans, and the other consortium would take responsibility for including others in its test plans. Under these arrangements, every company that manufactured a particular CAS number would be recognized as a sponsor for all of its CAS numbers without requiring the company necessarily to join every consortium.

The Panel consulted with EPA prior to submitting the volunteer letters and was advised to note these "division of labor" arrangements in the volunteer letters, which the Panel did by notations in footnotes. This division of labor approach pertained to 24 out of the 93 CAS numbers that were included in the letters listing chemicals sponsored by the Panel. However, apparently the letters were not clear on the Panel's intention regarding the 24 footnoted CAS numbers. It was not the Panel's intention to include these footnoted CAS numbers in test plans filed by the Olefins Panel. It was the Panel's intention for the Panel members to be sponsors of these CAS numbers by virtue of the arrangements the Panel had reached with other testing consortia.

In determining whether the Panel has met its obligation to submit a test plan covering each CAS number sponsored by the Panel, EPA needs to note in the inventory that the Panel is not the primary sponsor of these footnoted CAS numbers, and is not expected to include them in the Panel's test plans.

### **Specific Corrections to EPA Website**

The July 13, 2001 list (in the October 12, 2001 HPV Challenge Summary Report) contains all the CAS numbers that the Panel has agreed to sponsor. The July 13 list also correctly notes that API, rather than the Olefins Panel, will cover 3 of these CAS numbers (ethane, propane, and butane) in its test plans. A similar note needs to be added for additional CAS numbers. These additional CAS numbers were identified in footnotes in the Panel's October 18 and November 23, 1999 letters. In the course of developing the Panel's test plans, the Panel has decided to include three of the originally footnoted CAS numbers in its test plans. These CAS numbers are 64741-62-4, 64742-48-9, and 8002-05-9. For your convenience, the CAS numbers that should be noted as being covered by others in test plans in the July 13, 2001 list are shown in Table 1a attached to this letter. Table 1b includes those

CAS numbers that were originally footnoted, but that now will be covered by the Olefins Panel in test plans.

A similar note should be inserted in the September 6, 2001 1990 HPV report on EPA's website, for the substances listed in Table 1a.

The July 13 report also includes one CAS number, which is not in any of the Panel's volunteer letters. This CAS number is 26760-64-5. Robust summaries submitted with the Panel's test plan for the C5 Noncyclics Category includes data for CAS number 26760-64-5. However, that CAS number is not actually included in the test plan, and it was not the Panel's intention to include 26760-64-5 as a volunteered chemical. Rather, the data for this CAS number is being used to support the C5 Noncyclics Category. Please correct the list to remove any indication that the Panel is sponsoring CAS number 26760-64-5.

The Olefins Panel test plan for Resin Oils and Cyclodiene Dimers will include CAS number 68477-53-2. This CAS number was not in any of the Panel's Volunteer letters and it is neither a 1990 nor a 1994 HPV chemical. However, since the Panel is including this CAS number in a test plan, the Panel is now volunteering for it. Please add CAS number 68477-53-2 to the list of CAS numbers sponsored by the Olefins Panel.

Finally, to assist you in correctly identifying the 73 CAS numbers that the Panel plans to cover in its various test plans, the Panel has compiled a complete list in Table 2. This list includes the new CAS number (68477-53-2), which the Panel now plans to cover in a test plan. This CAS number is being added now as a result of findings made during the course of test plan development.

The Panel appreciates your attention to this matter. If you have any questions, please have your staff contact Dr. Elizabeth Moran, Manager of the Olefins Panel at 301 924 2006 or [Elizabeth\\_Moran@americanchemistry.com](mailto:Elizabeth_Moran@americanchemistry.com).

Sincerely yours,

Courtney Price  
Vice President, CHEMSTAR

Cc: C. Auer, EPA  
B. Leczynski, EPA  
J. Keith, ACC

Table 1a  
CAS Numbers Included in Panel's 1999 Letters - Covered by Others In Test Plans

	CAS	CAS Inventory Name	Covered by	SIDS/ICCA	In test plan submitted by others?
1	106-42-3	Benzene, 1,4-dimethyl-	T&X	yes	
2	106-97-8	Butane	PHTG		yes (1)
3	110-54-3	Hexane (this was deleted by 4/12/00 letter to EPA)	IHSC	yes	
4	1330-20-7	Benzene, dimethyl-	T&X	yes	
5	64741-47-5	Natural gas condensates, petroleum	PHTG		
6	64741-84-0	Naphtha, petroleum, solvent-refined light	IHSC	yes	
7	68308-27-0	Fuel gases, refinery	PHTG		
8	68410-71-9	Raffinates, petroleum, catalytic reformer ethylene glycol-water countercurrent exts.	PHTG		
9	68476-26-6	Fuel gases	PHTG		yes (1)
10	68476-29-9	Fuel gases, crude oil distillates	PHTG		yes (1)
11	68476-50-6	Hydrocarbons, C.g.toreq.5, C5-6-rich	PHTG	yes	
12	68478-00-2	Gases, petroleum, recycle, hydrogen-rich	PHTG		yes (1)
13	68478-01-3	Gases, petroleum, reformer make-up, hydrogen-rich	PHTG		yes (1)
14	68783-07-3	Gases, petroleum, refinery blend	PHTG		yes (1)
15	68814-47-1	Waste gases, refinery vent	PHTG		yes (1)
16	68814-67-5	Gases, petroleum, refinery	PHTG		yes (1)
17	74-82-8	Methane	PHTG		yes (1)
18	74-84-0	Ethane	PHTG		yes (1)
19	74-98-6	Propane	PHTG		yes (1)
20	95-47-6	Benzene, 1,2-dimethyl-	T&X	yes	

Table 1b<sup>2</sup>  
CAS Numbers Originally Footnoted as Covered by Others That  
Will Now Be Included in the Panels' Test Plans

	CAS	CAS Inventory Name	Previously indicated as Covered by	SIDS/ICCA
1	64741-62-4	Clarified oils, petroleum, catalytic cracked	PHTG	
2	64742-48-9	Naphtha, petroleum, hydrotreated heavy	IHSC	yes
3	8002-05-9	Petroleum	PHTG	
4	8030-30-6 <sup>3</sup>	Naphtha	PHTG	

T&X = Toluene and Xylene Panel

PHTG = API Petroleum HPV Testing Group

IHSC = International Hydrocarbon Solvents Consortium

(1) CAS number in Petroleum Gases test plan submitted by PHTG

(2) The CAS numbers listed in Table 1b are also listed in Table 2

(3) See note 4 at the bottom of Table 2

Table 2  
CAS Numbers Sponsored by The Olefins Panel and to be  
Included in Test Plans Submitted by Olefins Panel

	CAS Number	CAS Inventory Name	Test Year
1	106-98-9	1-Butene	2001
2	115-07-1	1-Propene	2001
3	25167-67-3	Butene	2000/2001
4	26472-00-4	4,7-Methano-1H-indene, 3a,4,7,7a-tetrahydrodimethyl-	2001
5	513-35-9	2-Butene, 2-methyl-	2001
6	64741-62-4 <sup>1</sup>	Clarified oils, petroleum, catalytic cracked	2001
7	64741-98-6	Extracts, petroleum, heavy naphtha solvent	2001
8	64741-99-7	Extracts, petroleum, light naphtha solvent	2001
9	64742-48-9 <sup>2</sup>	Naphtha, petroleum, hydrotreated heavy	2001
10	64742-49-0	Naphtha, petroleum, hydrotreated light	2001
11	64742-73-0	Naphtha, petroleum, hydrodesulfurized light	2001
12	64742-83-2	Naphtha, petroleum, light steam-cracked	2000/2001
13	64742-90-1	Residues, petroleum, steam-cracked	2001
14	64742-91-2	Distillates, petroleum, steam-cracked	2001
15	67891-79-6	Distillates, petroleum, heavy arom.	2001
16	67891-80-9	Distillates, petroleum, light arom.	2001
17	68131-05-5	Hydrocarbon oils, process blends	2001
18	68187-60-0	Hydrocarbons, C4, ethane-propane-cracked	2000
19	68333-88-0	Aromatic hydrocarbons, C9-17	2001
20	68409-73-4	Aromatic hydrocarbons, biphenyl-rich	2001
21	68410-97-9	Distillates, petroleum, light distillate hydrotreating process, low-boiling	2001
22	68475-70-7	Aromatic hydrocarbons, C6-8, naphtha-raffinate pyrolyzate-derived	2001
23	68475-80-9	Distillates, petroleum, light steam-cracked naphtha	2001
24	68476-43-7	Hydrocarbons, C4-6, C5-rich	2001
25	68476-44-8	Hydrocarbons, C>3	2000
26	68476-45-9	Hydrocarbons, C5-10 arom. conc., ethylene-manuf.-by-product	2001
27	68476-52-8	Hydrocarbons, C4, ethylene-manuf.-by-product	2000
28	68476-55-1	Hydrocarbons, C5-rich	2001
29	68477-35-0	Distillates, petroleum, C3-6, piperylene-rich	2001
30	68477-40-7	Distillates, petroleum, cracked stripped steam-cracked petroleum distillates, C10-12 fraction	2001
31	68477-41-8	Gases, petroleum, extractive, C3-5, butadiene-butene-rich	2000
32	68477-42-9	Gases, petroleum, extractive, C3-5, butene-isobutylene-rich	2001
33	68477-54-3	Distillates, petroleum, steam-cracked, C8-12 fraction	2001
34	68477-53-2 <sup>3</sup>	Distillates, petroleum, steam-cracked, C5-12 fraction	2001
35	68477-83-8	Gases, petroleum, C3-5 olefinic-paraffinic alkylation feed	2001
36	68478-08-0	Naphtha, petroleum, light steam-cracked, C5-fraction, oligomer conc.	2001
37	68478-10-4	Naphtha, petroleum, light steam-cracked, debenzenized, C8-16-cycloalkadiene conc.	2001
38	68512-91-4	Hydrocarbons, C3-4-rich, petroleum distillates	2000
39	68513-68-8	Residues, petroleum, deethanizer tower	2000
40	68513-69-9	Residues, petroleum, steam-cracked light	2001
41	68514-34-1	Hydrocarbons, C9-14, ethylene-manuf.-by-product	2001
42	68514-39-6	Naphtha, petroleum, light steam-cracked, isoprene-rich	2001
43	68516-20-1	Naphtha, petroleum, steam-cracked middle aro m.	2001
44	68526-77-2	Aromatic hydrocarbons, ethane cracking scrubber effluent and flare drum	2001



	CAS Number	CAS Inventory Name	Test Year
45	68527-11-7	Alkenes, C5	2001
46	68527-18-4	Gas oils, petroleum, steam-cracked	2001
47	68527-19-5	Hydrocarbons, C1-4, debutanizer fraction	2001
48	68527-23-1	Naphtha, petroleum, light steam-cracked arom.	2001
49	68527-24-2	Naphtha, petroleum, light steam-cracked arom., C5-12 cycloalkadienefraction, polymers	2001
50	68527-26-4	Naphtha, petroleum, light steam-cracked, debenzenized	2001
51	68603-00-9	Distillates, petroleum, thermal cracked naphtha and gas oil	2001
52	68603-02-1	Distillates, petroleum, thermal cracked naphtha and gas oil, dimerized	2001
53	68603-03-2	Distillates, petroleum, thermal cracked naphtha and gas oil, extractive	2001
54	68606-10-0	Gasoline, pyrolysis, debutanizer bottoms	2001
55	68606-26-8	Hydrocarbons, C3	2001
56	68606-28-0	Hydrocarbons, C5 and C10-aliph. and C6-8-arom.	2001
57	68606-29-1	Hydrocarbons, C4 and C8, butene concentrator by-product	2001
58	68606-31-5	Hydrocarbons, C3-5, butadiene purifn. by-product	2001
59	68606-36-0	Hydrocarbons, C5-unsatd. rich, isoprene purifn. by-product	2001
60	68919-15-3	Hydrocarbons, C6-12, benzene-recovery	2001
61	68921-67-5	Hydrocarbons, ethylene-manuf.-by-product distn. residues	2001
62	68955-28-2	Gases, petroleum, light steam-cracked, butadiene conc.	2000
63	68955-29-3	Distillates, petroleum, light thermal cracked, debutanized arom.	2001
64	68956-52-5	Hydrocarbons, C4-8	2001
65	68956-54-7	Hydrocarbons, C4-unsatd.	2000
66	68956-55-8	Hydrocarbons, C5-unsatd.	2001
67	68956-70-7	Petroleum products, C5-12, reclaimed, wastewater treatment	2001
68	69013-21-4	Fuel oil, pyrolysis	2001
69	69103-05-5 <sup>4</sup>	Hydrocarbons, C4-7, butadiene manif. by-product	2001
70	69430-33-7	Hydrocarbons, C6-30	2001
71	78-79-5	1,3-Butadiene, 2-methyl-	2001
72	8002-05-9 <sup>1</sup>	Petroleum	2001
73	8030-30-6 <sup>4</sup>	Naphtha	2001

Notes:

1. In the December 16, 1999 letter to Carol Browner, the Panel indicated that the PHTG would be responsible for the testing and documentation of results for these two CAS numbers. After additional review of composition data, it has been decided that the Panel will include these CAS numbers in its HPV test plans.
2. In the November 23, 1999 letter to Carol Browner, the Panel indicated that the HCSP would be responsible for the testing and documentation of results for this CAS number. After additional review of composition data, it has been decided that the Panel will include this CAS numbers in its HPV test plans.
3. This CAS number was not included in the previous lists of CAS numbers sponsored by the Panel and has been added to Category F.
4. This CAS number was footnoted for category E but not for category D. Thus, the Olefins Panel will cover this CAS number in one of its test plans.